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September 22, 2020

VIA ELECTRONIC FILING

The Honorable Sanket J. Bulsara
Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Elliott v. Donegan, et al.*,
Civil Case No.: 1:18-cv-05680-LDH-SJB**

Dear Magistrate Judge Bulsara,

We represent Plaintiff, Stephen Elliott, in the above-referenced matter and submit this letter on behalf of both parties, pursuant to Your Honor's Individual Practice Rule II.A, to respectfully request a two week extension of time for the parties to respond to document requests and interrogatories regarding Defendant Moira Donegan's CDA Immunity Defense.

Consistent with the schedule established by the Court at its July 23, 2020 conference, Ms. Donegan has served an affidavit and an initial production of documents, and the parties have served discovery requests. The Court-ordered deadline for responses to those requests is September 24, 2020. On September 10, 2020, counsel for Defendant wrote to counsel for Plaintiff raising concerns about Plaintiff's discovery requests. Counsel for Plaintiff has been unable to respond to that letter due to unforeseen medical issues suffered by counsel's father. The parties respectfully submit that a two-week extension of time—to October 8, 2020—is warranted to allow the parties an opportunity to make progress in their efforts to agree on the appropriate scope of discovery.

The parties thank Your Honor, for the Court's courtesy and consideration.

Very truly yours,

By: /s/ N.E. Lewis
Nicholas Lewis, Esq.
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